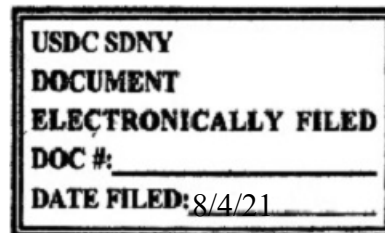


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August 3, 2021

**Via ECF**Hon. Barbara Moses, U.S. M.J.  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312**Re: Spirito v. Comm'r of Soc. Sec.**  
**Docket No.: 1:20-CV-08741-VEC-BCM**

Dear Magistrate Judge Moses:

I represent the plaintiff, Mark Spirito, in the above-referenced matter seeking review of the denial of Social Security benefits. Assistant U.S. Attorney Mary Ellen Brennan represents the Commissioner. I write in accordance with Your Honor's Individual Practice Rules to request an adjournment of the briefing schedule, as follows:

	<u>Current Deadline</u>	<u>New Deadline</u>
Plaintiff's Motion	Aug. 11, 2021	<b>Sept. 27, 2021</b>
Defendant's Cross-Motion	Oct. 11, 2021	<b>Nov. 29, 2021</b>
Plaintiff's Reply	Nov. 1, 2021	<b>Dec. 13, 2021</b>

I make this request because the COVID-19 Pandemic has led to multiple delays on almost all of the cases I have against the Social Security Administration. As a result, cases filed months ago and even in 2020 (like this one) are all finally producing the Administrative Records and causing multiple conflicting deadlines. For example, I currently have six (6) moving briefs and one reply brief due on different cases by August 31, 2021. As a result, multiple adjournment requests are unavoidable.

I have consulted with Ms. Brennan, and she consents to this request. There have been no prior requests for an adjournment of these deadlines by the plaintiff, however, the Commissioner had requested an adjournment (on consent) of the deadline to produce the Administrative Record.

If any additional information is needed, please do not hesitate to contact me. Thank you for your consideration of this request.

Application Granted. SO ORDERED.

Barbara Moses  
United States Magistrate Judge  
August 4, 2021

cc: Mary Ellen Brennan, AUSA (Via ECF)

By:

Respectfully submitted,  
**THE DEHAAN LAW FIRM P.C.**  
/s/ John W. DeHaan  
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